

EXHIBIT 28

NO: X06-UWY-CV18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022
· · · · ·
NO: X06-UWY-CV18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022
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WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022

BEFORE THE HONORABLE BARBARA BELLIS, JUDGE
AND JURY

VOLUME II OF IV

WITNESS: BRITTANY PAZ BEGINNING AT 11:34 TO 12:54

A P P E A R A N C E S :

Representing the Plaintiff:

ATTORNEY CHRISTOPHER MATTEI
ATTORNEY ALINOR STERLING
ATTORNEY JOSHUA KOSKOFF
ATTORNEY MATTHEW BLUMENTHAL

Representing the Defendant:

ATTORNEY NORMAN PATTIS
ATTORNEY ZACHARY REILAND

Recorded By:
Kendyl Henaghan

Transcribed By:
Shannon LeRoy
Court Recording Monitor
300 Grand Street
Waterbury, CT 06702

1 (THE JURY ENTERED THE COURTROOM.)

2 THE COURT: Please be seated. I'll do my mental
3 count of ten to make sure you're all here. Counsel
4 will stipulate that the panel is present.

5 ATTY. PATTIS: We'll do.

6 ATTY. MATTEI: Yes, Your Honor.

7 THE COURT: All right.

8 ATTY. PATTIS: Your Honor, may I speak to
9 Mr. Ferraro before we begin?

10 THE COURT: Certainly.

11 ATTY. PATTIS: Thank you, Judge.

12 THE COURT: You're welcome. Whenever you're
13 ready, Attorney Mattei.

14 ATTY. MATTEI: Thank you, Your Honor. I'm just
15 thinking. I'm making this easel and I was thinking
16 about the best place to put it so that everybody can
17 see it. I suppose it would probably be over here so
18 that defense counsel can see it.

19 THE COURT: That's pretty far for the jury.

20 ATTY. MATTEI: It is. I guess I can put it up
21 there.

22 THE COURT: Well, let's see if defense counsel
23 can see it.

24 ATTY. MATTEI: All right.

25 THE COURT: We'll figure it out.

26 ATTY. MATTEI: All right. So why don't we call
27 up Exhibit 2000 and - 215.

1 THE COURT: I got a little nervous there.

2 ATTY. MATTEI: Yeah, sorry.

3 THE COURT: That's a full exhibit?

4 ATTY. MATTEI: Yes, Your Honor.

5 THE CLERK: Yes, it is, Your Honor.

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1 B R I T T A N Y P A Z,

2 having been called as a witness, was previously duly
3 sworn, examined, and testified as follows:

4 DIRECT EXAMINATION BY ATTORNEY MATTEI CONTINUED:

5 Q Now Ms. Paz, this is the same group report for the
6 year prior, 2014. Right?

7 A Right, that's what it looks like.

8 Q All right. And do you have the same response as you
9 did with the earlier one, that you don't know if this was
10 provided to you?

11 A I don't - yeah, I don't recall, I'm sorry.

12 Q All right, no problem. But you'd agree that just
13 like the 2015 report, this 2014 report shows all of Info
14 Wars social medial performance for the year 2014 on those
15 four social media platforms, Twitter, Facebook, Linkedin and
16 Instragram?

17 A Right.

18 Q Okay, all right. Let's go to page 2. And these are
19 the accounts listed here -

20 (Someone's phone went off)

21 BY ATTORNEY MATTEI:

22 Q I'll count them up, I'm not going to ask you to count
23 them up. I'll count them up at some point for the jury.

24 A Sure.

25 Q There's a lot. Right?

26 A There are quite a few.

27 Q All right. And let's go to - oh, Youtube is not

1 here. Do you know why?

2 A I don't know why. We were - well Free Speech was
3 de-platformed in 2018 but this is 2014 so I don't know.

4 ATTY. MATTEI: Objection, move to strike, Your
5 Honor.

6 THE COURT: Sustained.

7 ATTY. MATTEI: Okay.

8 BY ATTORNEY MATTEI:

9 A I don't know.

10 THE COURT: The testimony is stricken, the jury
11 will disregard it.

12 ATTY. MATTEI: Thank you.

13 BY ATTORNEY MATTEI:

14 Q In 2014 obviously, Info Wars was uploading videos to
15 Youtube every day. Correct?

16 A Yes.

17 Q Okay. But it didn't produce any data to us
18 concerning its Youtube page performance. Correct?

19 A Did we? No.

20 Q Okay. Let's go to the next page. All right. And
21 let's pull up - you know what, let's pull up not just the
22 top box but like the whole area where there's texts. Okay?
23 Yeah, there you go. Good, okay. Now you recall that in
24 2015, and I should have started with this one, I'm sorry.
25 But in 2015 the total number of impressions was 2.9 billion.
26 Right?

27 A I'll take your representation on that, I don't

1 recall.

2 Q You don't recall.

3 A I'll accept that representation.

4 Q All right. Here it's - I'll show it to you again.
5 Here it's 2.2 billion impressions. Right?

6 A Yes, that's what it says.

7 Q And this is where at the advise of my co-counsel I'm
8 going to use this easel. All right? Because I want -
9 sometimes people feel better about paper versus the screen.
10 So -

11 MS. PAZ: Is it all right if I turn?

12 THE COURT: That's fine.

13 BY ATTORNEY MATTEI:

14 Q So we're talking about -

15 ATTY. MATTEI: Can you see, counsel?

16 ATTY. PATTIS: Yes. Yes, depending on how big
17 the numbers are.

18 ATTY. MATTEI: You guys can see it. Now there
19 are other screens so you don't have to look at this
20 if you don't want to.

21 BY ATTORNEY MATTEI:

22 Q But let's talk about 2014. Okay. You got 2.2
23 billion impressions. Right?

24 A That's what this says, yes.

25 Q All right. And 7.7 million engagements. Right?

26 A Sure, you can round that up to 7.8.

27 Q Thank you, 7.8. 10.3 million link clicks. Right?

1 A Yes.

2 Q Now 2014, this was the year that Alex Jones first had
3 Wolfgang Halbig on his show. Right?

4 A 2014, yes, that's correct.

5 Q Right.

6 A Yes.

7 Q And Wolfgang Halbig on the Alex Jones Show called the
8 Sandy Hook shooting an illusion. Right?

9 A Did Wolfgang Halbig do that?

10 Q Yeah.

11 A Yes, he did.

12 Q And Alex Jones agreed with him?

13 A Yes.

14 Q Okay. He said that the parents should get an Oscar
15 for their acting performance. Right?

16 A I believe he did, yes.

17 Q And Alex agreed with him?

18 A I believe so, yes.

19 Q Okay. He said that it had been scripted two plus
20 years in advance the shooting happened. Right?

21 A Did Mr. Halbig say that?

22 Q Right.

23 A Yes.

24 Q And Alex Jones agreed?

25 A Yes.

26 Q And by the way, it wasn't just Mr. Halbig, I mean
27 Alex Jones in 2014 was calling it a fake and a total hoax.

1 Correct?

2 A Yes.

3 Q All right. And during this year you know that all of
4 those shows and all of those articles lying about Sandy Hook
5 went up on Info Wars social media channels. Correct?

6 Q Yes, they did.

7 Q Do you recall Louis Serrtuche's deposition testimony?

8 A I don't think I do. I'm sorry.

9 Q You know who Louis Serrtuche is. Right?

10 A I'm terrible with names -

11 Q Okay.

12 A - so it's not ringing a bell.

13 Q Do you remember the guy's deposition with the long
14 hair testified about Free Speech System social media
15 operations?

16 A I don't recall, I'm sorry.

17 Q Did you watch the deposition of Info Wars Social
18 Media Manager?

19 A I read - I know I read the deposition of Mr. Roddy
20 and Mr. Zimmerman. Aside from that, the other ones, I don't
21 recall.

22 Q All right. Let me just try one more time. I take it
23 then that you don't have a recollection of his testimony
24 that all Info Wars articles and videos went up on all of
25 their social media platforms, including all of their Sandy
26 Hook content?

27 A I don't recall the testimony.

1 Q Okay. Is that in fact true?

2 A That all of the videos go up on all of the social
3 media platforms?

4 Q Yes.

5 A Clips of them do, yes.

6 Q Yes. And all of Youtube. Correct?

7 A Yes, yes.

8 Q All right. Now in this year where Alex Jones and
9 Wolfgang Halbig were doing these things, they generated a
10 total fans of 1.7 million. I don't know what - do you know
11 what that means?

12 A I'm sorry, the clipboard is in the way. Okay, go
13 ahead.

14 Q You don't have it there?

15 A I do have it there. Which one are you referring to?

16 Q Your total fans 1.7.

17 A Oh yes, I see it.

18 Q Right. And you see that the total followers since
19 the previous date branch went up 41 percent. Yeah?

20 A That's what it says, yes.

21 Q All right. Let's go down to the next page. Okay.
22 Now you'll see here, this is about message volume. Right?

23 A Yes.

24 Q Message volume means messages that Info Wars fans are
25 sending into their social media mails. Right?

26 A Yes.

27 Q Is one way that Info Wars engages its audience.

1 Right?

2 A One of the ways.

3 Q We're going to hear Alex Jones say, send us your
4 tips. Right?

5 A Sure.

6 Q Okay. And you're aware that one of the things that
7 Info Wars did on Facebook in particular was give its
8 audience missions. Do you know what that means?

9 A I recall seeing it saying, missions.

10 Q Right.

11 A So yes, I know what you're talking about.

12 Q They say to their audience, here's your mission.
13 Right?

14 A Yes.

15 Q Okay. And it's another way of engaging their
16 audience. Right?

17 A Right, it's - the verbiage is used to take in the
18 audience, that's correct.

19 Q Right. And one of the ways that Alex Jones did that
20 was by giving his audience a mission to investigate Sandy
21 Hook. Right?

22 A Was that one of the missions?

23 Q Yes.

24 A I don't recall if it was specifically one of the
25 missions but I mean it was - he did give out missions. I do
26 recall seeing social media posts to that effect.

27 Q Right. And one of the missions, in fact, not just -

1 one that he gave out was to investigate Sandy Hook. Right?

2 ATTY. PATTIS: Asked and answered, Judge. She
3 already said she didn't recall.

4 MS. PAZ: I don't recall specific posts.

5 BY ATTORNEY MATTEI:

6 Q You do recall though Alex Jones looking directly at
7 the camera on his show and telling his audience that, let's
8 look into Sandy Hook. Right?

9 A I do believe I recall seeing him saying something to
10 that effect.

11 Q Right. He said that right after he sent his
12 audience, and I think I can get the exact wording. You tell
13 me if I'm wrong. Right after he said to his audience, so my
14 heart goes out to the people I see on the news who say
15 they're parents. The only difference is I seen soap operas
16 before and I know the difference between when I'm watching a
17 movie and when I'm watching something real. Let's look into
18 Sandy Hook. Do you remember that mission?

19 A I don't know if he termed it a mission but I recall
20 him using words to that effect.

21 Q And in this year the messages that they were
22 receiving from their fans went up 557 percent. Yeah?

23 A On social media, yes.

24 Q Yes. They got emails too.

25 A Many, many emails.

26 Q Right. All right, let's go to the next page. Ah,
27 okay. So now here we're getting into the breakdown of the

1 impressions. You see Facebook had 1.2 billion and at
2 Twitter you're at 1 billion. Right?

3 A That's what this says, yes.

4 Q Up 300 percent, 307 percent from the year before.
5 Right?

6 A That's what it says, yes.

7 Q Okay. Is there another page? Yeah, let's pull up
8 the next two pages side by side, if you don't mind. See
9 this chart is getting a lot of use here. All right. While
10 we're working on that, I'm going to show you the engagements
11 here. Engagements also 100 percent. Right?

12 A Yes, that's what it says.

13 Q And that's what we were talking about earlier. Every
14 time an audience member likes something. Right?

15 A Right.

16 Q Shares it.

17 A Right.

18 Q Reposts it.

19 A Right.

20 Q Right? Comments on it.

21 A Right.

22 Q And that type of engagement is what Info Wars was
23 going for. Correct?

24 A Sure.

25 Q All right. And it increased 100 percent in 2014.
26 Right?

27 A That's what that says.

1 Q The year they were having Halbig on. Actually, the
2 first year they had Halbig on.

3 A Right. They started to have him on that year.

4 Q Okay. Okay, so what I want to do now is go to the
5 page where all the accounts are listed, if we can.

6 THE COURT: Attorney Mattei, are you going to
7 use that chart?

8 ATTY. MATTEI: I can for the next one, for 2015.
9 Is it in the way?

10 THE COURT: No, it just won't turn this way, but
11 that's all right.

12 BY ATTORNEY MATTEI:

13 Q I'm sorry, down where they have the - down near the
14 icons. Yeah, yeah. So these are just the graphic listings
15 of the different accounts here. Right? So if you went to
16 one of the pages you'd see you know, the Info Wars report.

17 A Yes.

18 Q That's where down further you got the Alex Jones
19 page. Right?

20 A Yes.

21 Q Right. And obviously like the Alex Jones page is
22 dwarfed the other ones in terms of the popularity on sites.
23 Correct?

24 A According to this you mean?

25 Q Yeah.

26 A Oh yes, because this is ranked so the others are
27 ranked higher so, yes.

1 Q Well this is where Facebook starts, so like on this
2 side, right, that's Twitter above.

3 A Right.

4 Q Here's Facebook, obviously you know, he's way above
5 everybody else. Yeah?

6 A Yes.

7 Q All right. Let's go to 2015. The next one, 2015.
8 This is the one we were looking at earlier that I told you
9 I'd show you again.

10 A Yes.

11 Q Let's use this again here. All right, and let's go
12 to the second page. All of these, here's the accounts.
13 Right? Let's go to the third page. Okay. And here we are
14 again, and here we have the 2.9 billion impressions. Right?
15 The times his stuff is viewed. Yeah?

16 A Yes.

17 Q Okay. And let's go down and see the growth numbers.
18 Yeah? So here fans are up 21 percent this year in 2015.
19 Correct?

20 A That's what it says, yes.

21 Q Okay, let's go to the next page. Here we are again
22 with increasing engagement in terms of messages coming in.
23 Up 129 percent since the previous date range in terms of -
24 so the first number 129 percent are posts sent and that's
25 messages that Info Wars was sending out. Those are those
26 missions we were talking about. Right?

27 A Among other things, but yes.

1 Q And the messages they were receiving, also 144
2 percent. Right?

3 A That's what it says, yes.

4 Q All right. Let's go to the next page. Okay,
5 impressions up 30 percent over the 2.2 billion, up to 2.9.
6 Yeah?

7 A That's what it says, yes.

8 Q Okay. Now let's get out of this. Far and away, well
9 let's pull up the Facebook group report for - I'm sorry, not
10 the group report. The Facebook report for 2016.

11 ATTY. MATTEI: This is in evidence, Your Honor.

12 And this is 222.

13 BY ATTORNEY MATTEI:

14 Q Now this is just Facebook. Right?

15 ATTY. PATTIS: I don't think 222 is in yet, but
16 I don't object.

17 THE CLERK: It is a full exhibit, Attorney
18 Pattis.

19 ATTY. PATTIS: Okay.

20 BY ATTORNEY MATTEI:

21 Q All right. Now this is 2016. Right?

22 A The following year, yes.

23 Q The following year. This doesn't include Twitter,
24 this is just Facebook.

25 A That's what it looks like to me.

26 Q We didn't get Twitter numbers for 2016. Correct?

27 A I don't believe so.

1 Q Okay. But anyway, we got Facebook. So let's - let's
2 go down to the second page. These are the accounts included
3 in the report. This isn't all the reports, this is just the
4 accounts that were included in this report. Correct?

5 A It's all of the Facebook accounts.

6 Q Well we'll compare it. But anyway, let's go down.
7 Okay, so in 2016 how many impressions were there?

8 A 4.1 or 4.2.

9 Q Billion, right?

10 A Billion.

11 Q So Facebook alone in 2016 4.1 billion. Yeah?

12 A That's what it says.

13 Q That's what it says, all right. 43 million
14 engagements. So what we're seeing here is during these
15 three years for which we have data, this is the exponential
16 growth we were talking about. Right?

17 A Using Mr. Jones' words, yes.

18 Q Yeah, right.

19 A Yes.

20 Q And it would be fair to say, wouldn't it, that Alex
21 Jones had no competitors when it came to social media online
22 engagement. Correct?

23 A I'm sorry, what do you mean competitors?

24 Q Yeah. In terms of people who were lying about Sandy
25 Hook during this time. Right? Nobody touches Alex Jones in
26 terms of audience. Fair to say?

27 ATTY. PATTIS: Objection, Judge, speculative.

1 MS. PAZ: I don't know, I don't know.

2 THE COURT: Overruled.

3 BY ATTORNEY MATTEI:

4 A I don't know how to answer that. I didn't prepare
5 any information comparing other broadcasts.

6 Q Okay.

7 A I can only speak for Free Speech.

8 Q Great. Well then let me ask you this from Free
9 Speech's respect. Is Free Speech Systems aware of any other
10 media personality during this time who was publishing
11 information that Sandy Hook was a hoax that even comes
12 remotely close to his audience size?

13 A I can't - like I said, I can't answer that, I don't
14 know anything about any other company besides Free Speech.

15 Q So the answer is, Free Speech Systems is not aware of
16 any. Correct?

17 A The answer is, I don't know.

18 Q Free Speech Systems doesn't know?

19 A That's correct.

20 Q Right. All right, now correct me if I'm wrong, but
21 during this three year period, just impressions and just on
22 some of the social media platforms, there were 922 billion
23 impressions. Correct?

24 A Impressions, yes.

25 Q Yeah. All right.

26 A I'll trust your amount on that.

27 Q All right. Now although we don't have social media

1 numbers for those earlier years, we did do Google Analytics.

2 Correct?

3 A For which years?

4 Q We saw them for - I showed them to you for 2011 -

5 A Yes.

6 Q - and 2012.

7 A Yes.

8 Q Right. And then in 2013.

9 A Yes.

10 Q And those Google Analytics numbers weren't social
11 media, they were just Infowars.com.

12 A I believe so, yes.

13 Q (Inaudible).

14 A Yes.

15 Q But Info Wars produced things called media kits.

16 Right?

17 A Media kits. What do you mean by media kits?

18 Q Well I'll show you.

19 ATTY. MATTEI: So this is Exhibit 212, which is
20 in as full, Your Honor.

21 BY ATTORNEY MATTEI:

22 Q This is an email. Let's pull up the email header.
23 Okay, now this is a message from Derick and Infowars.com.
24 Do you know who Derick is?

25 A I know that we had an employee named Derick that I
26 don't believe works there anymore but, yes.

27 Q Yeah, okay. You don't know his last name?

1 A I don't.

2 Q Okay.

3 A I'm sorry.

4 Q He was an employee in 2013?

5 A 13, yes.

6 Q Do you know what he did?

7 A I don't.

8 Q Okay. What about the people who he sent this to,
9 Will and Info Wars and Max at Info Wars? Do you know who
10 those guys are?

11 A I'm sorry, no.

12 Q Okay. And you'll see here that there are attachments
13 to this email, media kit?

14 A That's what it says.

15 Q Okay. So what's a media kit?

16 A I don't know.

17 Q Okay. Do you know what Free Speech Systems used them
18 for?

19 A I don't know what it is, I've never seen this before.

20 Q This wasn't given to you?

21 A I don't believe I've seen this.

22 Q Okay. Well, let's take a look at it, let's pull up
23 the attachments. Now what you'll see, Ms. Paz, is there's a
24 date here, 2013. Right?

25 A That's what it says.

26 Q And it says, Free Speech Systems, LLC.

27 A Yes.

1 Q And it kind of gives you the topics that it's - that
2 this document is covering. Right?

3 A Yes.

4 Q Now we'll go through the document but let's - if
5 you're looking at this cover page, does this give you a
6 sense that what this is is the type of information that Alex
7 Jones would give to potential advertisers who would pay to
8 place ads on Infowars.com?

9 A That's what it looks like.

10 Q Okay. And so let's go down. And you see there, the
11 first line, the house that truth built.

12 A I see it.

13 Q And you know that Alex Jones, in selling himself to
14 advertisers, but also in selling himself to his audience,
15 tells them that they can count on him for the truth. Right?

16 A I have seen him say that, yes.

17 Q Right. You've seen videos where he's said,
18 somebody's got to tell you the truth, folks. Right?
19 Somebody's got to do it.

20 A I've seen him say words to that effect, yes.

21 Q Yeah. He actually said that right after he told his
22 audience that Sandy Hook was staged, the evidence is
23 overwhelming.

24 A I've seen him say that, yes.

25 Q Right. He said that in April of 2013. Right?

26 A I don't recall the date but I know that he said
27 something to that effect, yes.

1 Q You don't recall that it was on the day of the Boston
2 Marathon bombing?

3 A I don't recall the date, I'm sorry.

4 Q All right. So let's go down here. And what I'd like
5 to do is go down to the second page. All right, now let's
6 pull up kings of their domains and just pull up the - yeah,
7 that's okay. Here he is saying, in terms of web popularity,
8 Infowars.com and Prisonplanet.com are on top of their class.
9 Right?

10 A That's what it says, yes.

11 Q All right. And this is 2013. Correct?

12 A I think that's the date that was on the document,
13 yes.

14 Q Okay. And it gives the number of visitors to the
15 websites per month, the number of unique visitors per month,
16 the number of 30 million page views per month. Right?

17 A Yes, that's what it says.

18 Q Okay. Ms. Paz, isn't this Free Speech Systems using
19 Google Analytics?

20 A I don't know how they got those numbers.

21 Q Well we've seen the Google Analytics where these
22 numbers are presented. Correct?

23 A We've seen Google Analytics numbers, yes.

24 Q Right. Where else would they have got them?

25 A I don't know. I don't know where those numbers come
26 from.

27 Q But you know that they didn't use it, that's what you

1 told the Judge.

2 A I told the Court what information was relayed to me,
3 that they did not regularly use the Google Analytics in
4 terms of their marketing.

5 Q What you told the Judge was, because the Judge asked
6 you, is that a yes or no, in response to the question, does
7 Free Speech Systems use Google Analytics. She said, is that
8 a yes or no? And you said, that's a no. Right?

9 A Right.

10 Q And the reason you think it's a no is because that's
11 what Info Wars and Alex Jones told you. Correct?

12 A I don't believe Alex told me that but I think I said,
13 Blake Roddy told me that.

14 Q And it's not true. Is it?

15 A I can only convey to you what - what I discussed with
16 the employees and what I've reviewed. So that's based on my
17 review.

18 Q Because Info Wars doesn't want this jury to know just
19 how closely it was tracking his audience growth as Alex
20 Jones was saying that Sandy Hook was a lie. Right?

21 A I don't think that's accurate.

22 Q Let's go down to the next page here. You don't think
23 that's accurate because somebody told you that?

24 A Do I think I want the jury not to know about the -

25 Q Not you, not you.

26 A Alex Jones.

27 Q Whoever claimed to you that they don't use Google

1 Analytics wanted you to say that to the jury.

2 ATTY. PATTIS: Objection, Judge, it's
3 speculating contents of another mind.

4 THE COURT: Overruled.

5 BY ATTORNEY MATTEI:

6 A Do I think that Mr. Roddy didn't want me to know that
7 Free Speech uses Google Analytics?

8 Q Well he definitely didn't want you to know that,
9 that's why he told you that they don't use it. Right?

10 A I don't think that was the reason why he told me
11 that, no.

12 Q Okay. Whatever the case is, when Mr. Roddy told you
13 that they don't use Google Analytics, he knew that that's
14 what you were going to come and tell this jury. Right?

15 ATTY. PATTIS: Objection, Judge.

16 THE COURT: Sustained.

17 BY ATTORNEY MATTEI:

18 Q All right, let's go - let's see here -

19 ATTY. MATTEI: Your Honor, just one moment, if I
20 may?

21 THE COURT: Take your time.

22 BY ATTORNEY MATTEI:

23 Q We're going to talk about Blake Roddy -

24 A Okay.

25 Q Now Blake used to work for Tim Fruge. Right?

26 A Yes. So I do believe he worked underneath Tim for a
27 while and then he took over at a certain point, probably

1 after Tim left.

2 Q So just to make - just to make sure the jury knows,
3 because there's a lot of names being thrown around. Tim
4 Fruge, prior to when he left in 2019 was Info Wars Online
5 Commerce Director. Correct?

6 A I don't know if he had a title but he handled the
7 website.

8 Q Okay.

9 A So, yes.

10 Q Okay, well that's different.

11 A And the e-commerce side of the website so, yes.

12 Q All right. So he ran - he ran the online store, he
13 tracked the sales, he had - he ran the warehouse, the whole
14 you know, revenue generating side of the business, Tim Fruge
15 supervised and reported to Alex Jones. Right?

16 A Sure.

17 Q Okay. And Blake Roddy was his subordinate. Tim
18 Fruge supervised Blake Roddy?

19 A Yes.

20 Q Tim Fruge leaves in 2019, Blake Roddy gets promoted?

21 A Right.

22 Q So that's - those are the guys we're talking about.
23 Right?

24 A Yes.

25 Q Okay. And what we see here on the - on the top left
26 is what Info Wars is telling its advertisers they're going
27 to charge. Right?

1 A Yes, that's what that looks like.

2 Q Okay. \$2 - what's CPN mean?

3 A Cost per - you know what, I'm blanking on what the N
4 is.

5 Q Okay.

6 A I'm sorry.

7 Q Okay.

8 A I don't recall.

9 Q Okay. Now basically they're saying that for every
10 thousand impressions your ad gets. Is that what you
11 understand to be, he gets paid two bucks?

12 A Right.

13 Q Then you pay us every time somebody clicks on it he
14 pays 50 cents?

15 A Right, so there's a difference between impressions
16 and the actual engagement and the cost, right.

17 Q Now the reality is that Info Wars didn't advertise
18 other people's products very much. Right?

19 ATTY. PATTIS: Objection. When, Judge?

20 THE COURT: Sustained.

21 BY ATTORNEY MATTEI:

22 Q 2013 let's say.

23 A I - I guess I don't know how to answer that. You
24 mean if we were advertising, if we were taking money for
25 advertisements where we were actually advertising the
26 products on the store?

27 Q No, no.

1 A Okay.

2 Q What I'm saying is really, almost every product that
3 Info Wars advertises on its platforms are its own products.

4 ATTY. PATTIS: Objection. In 2013?

5 THE COURT: Sustained.

6 BY ATTORNEY MATTEI:

7 A Right.

8 Q And that remains true. Yeah?

9 A Sure.

10 Q Okay. Let's go to the 2014 media kit, this is 216.

11 THE CLERK: That's a full exhibit, Your Honor.

12 THE COURT: Thank you.

13 ATTY. MATTEI: Thank you.

14 BY ATTORNEY MATTEI:

15 Q Okay. So you see here, this is the media kit they
16 put out for 2014. Right?

17 A Yes.

18 Q Next year they're telling their potential
19 advertisers, come advertise with us. Right?

20 A Yes, that's -

21 Q And the main pitch they make to potential advertisers
22 is just how big and engaged their audience is. Right?

23 A Well right, the purpose of it is to make people want
24 to advertise with the company.

25 Q And the way you do that is by telling the people just
26 how many eyeballs are going to fall on their ads if they
27 advertise with Info Wars. Right?

1 A Right.

2 Q All right. Let's go to the next page. Now I'm going
3 to be honest with you, Ms. Paz, I'm just going to ask you.
4 Again, this is the house that truth built. Right?

5 A I see that, yes.

6 Q You know, if we go to the text.

7 A Yeah, it's not words, or maybe Latin words.

8 Q And were they advertising internationally do you
9 know?

10 A No.

11 Q You don't know?

12 A I don't know.

13 Q Okay. Let's go to the topping the charts. Okay,
14 okay, okay. So on the top there you have the again, they're
15 telling their audience just how many million visitors per
16 month. Right?

17 A Yes.

18 Q Okay. And they're telling their audience their
19 rankings. Right? Their website rankings.

20 A I'm sorry, where are you looking?

21 Q Yeah.

22 A Topping the chart -

23 Q Where you see topping the charts, holding our own
24 against the mainstream media.

25 A Okay, I see, it's the comparison. Yes, I see it.

26 Q It's the comparison, like what you see.

27 A Yes.

1 Q So you see the six different websites listed there.
2 Right?

3 A Yes.

4 Q And what they're waying is hey, we're bigger than
5 Glen Beck, we're bigger than Rush Limbaugh, we're bigger
6 than News Max and we're bigger than WND.com, whatever that
7 is. Right?

8 A Yes.

9 Q Okay. They're the biggest. Right?

10 A I - I guess my question is, I don't know what those
11 numbers mean. Maybe zoom out a little bit.

12 Q Well you know what, yes, go ahead and do that. But
13 you know that Alex Jones consulted a program called Alexa.
14 Right?

15 A Okay, all right, I see what it is.

16 Q Yeah.

17 A Yes, okay.

18 Q And this isn't the Alexa you have in your kitchen -

19 A No.

20 Q - you ask what the whether is going to be today.
21 Right?

22 A No.

23 Q This is a website ranking program. Right?

24 A That's the source, yes.

25 Q Right. And when Alex Jones - and you know that Alex
26 Jones regularly consulted Alexa to see where Infowars.com
27 was in the world rankings. Right?

1 A I believe he did.

2 Q Yeah. And here, as of 2014 in the United States
3 Infowars.com was the 301 most popular website.

4 A That's what it says, yes.

5 Q Right. Of all the millions of websites in the United
6 States. Right?

7 A That's what it says here.

8 Q Okay. And in the world, all the websites in the
9 world, Info Wars was 1000 -

10 A 222.

11 Q 222. Right?

12 A Yes, I see that.

13 Q Let's get out of this. All right, yeah, yeah. I
14 think - let's go - I'm sorry, go to the next page. Thanks.
15 Oh, okay. So if we go - yeah, let's go to that page. I'm
16 sorry, the next one down. Here they're just giving pricing
17 again. Right? Let's go up that page, demographics. Okay
18 now, what program was Info Wars using to track the
19 demographics of its audience?

20 A You mean to create this chart?

21 Q Yeah, yeah, where did these numbers come from?

22 A I don't know where these numbers come from.

23 Q Okay. Do you have any idea how Infowars.com knows
24 that 60 percent of its users are male and 40 percent are
25 female?

26 A I don't know what information was used to create this
27 chart -

1 Q Okay.

2 A - so I don't know.

3 Q But one of the topics that you were responsible for
4 presenting sworn testimony to the jury on was exactly this,
5 his audience. Right?

6 A Right.

7 Q Okay. And so did you ask hey, what information does
8 Info Wars have on audience demographics?

9 A I did. When we had the - we produced the Google
10 Analytics but as we said earlier about how or when the
11 Google Analytics were used, that was the information that
12 was conveyed to me.

13 Q Is it your understanding that Google Analytics tracks
14 demographics?

15 A I don't know if it tracks demographics.

16 Q I thought that's what you just said.

17 A I don't know if it tracks demographics.

18 Q Okay. If it does then here we see another example -

19 ATTY. PATTIS: Objection, hypothetical,
20 speculative. If it does.

21 THE COURT: Sustained.

22 BY ATTORNEY MATTEI:

23 Q So you asked somebody at Free Speech Systems about
24 Info Wars audience. Correct?

25 A You mean how much - how much the audience is and the
26 breakdown of it or...

27 Q No, I'm talking specifically about demographics.

1 A Just demographics.

2 Q That's all I'm asking about. Did you ask hey, I'm
3 supposed to testify with this jury about Info Wars audience
4 demographics. What do you have on that?

5 A I believe I did, I just don't recall whether I ever
6 received any information on it. I don't think I did.

7 Q Okay, all right. And so when you said A, there's
8 this trial, there's going to be a jury, I'm going to be
9 asked about demographics. Can you give me what you have?
10 You don't think they gave you anything?

11 A Right.

12 Q They clearly had it. Right?

13 A Well, I don't know what they had or where they got
14 this from. I just don't know -

15 Q You don't know.

16 A - where this information came from, right.

17 Q But it came from somewhere.

18 A Well it had to come from somewhere, I just don't know
19 where.

20 Q And they're purporting to their potential advertisers
21 that this is their audience demographics.

22 A That's what it says, yes.

23 Q But they didn't give you that information.

24 A Of how they came to those numbers, no.

25 Q Or even that they had the numbers.

26 A Or that they had the numbers or where they came from
27 or if they were reliable. I don't know.

1 Q Okay, all right. Okay, let's go to 217, the Media
2 Wars media kit. I'm sorry, Exhibit 2017 [sic], this will be
3 the 2016 media kit.

4 THE CLERK: Counsel, you mean Exhibit 217, not
5 2017?

6 ATTY. MATTEI: Right. Yeah, yeah, oh yeah.

7 BY ATTORNEY MATTEI:

8 Q All right, now we're in 2016, same deal. Right?

9 A Yes.

10 Q And there's really just a couple things I want to go
11 through with you on this one. Let's go to the second page.
12 Let's go down. Okay, how's the truth built, we know that.
13 Let's go down. All right. Now let's pull up the bottom
14 part here. Yeah, yeah, okay. Now here, this is Alex Jones
15 telling potential advertisers about his reach. Right?

16 A Yes, same as in previous ones.

17 Q Okay, but this is 2016.

18 A Right.

19 Q And now he's got - he's got 150 affiliate radio
20 stations that his - the Alex Jones Show was airing to.
21 Right?

22 A That's what it says, yes.

23 Q Okay. He's got 40 million page views a month.

24 A That's what it says, yes.

25 Q Okay. And that's just on Infowars.come. Right?

26 A And - I don't know if it also includes like Prison
27 Planet and the other websites but...

1 Q Right. For that we have to check Google Analytics.
2 Right?

3 A Right.

4 Q Right. Youtube, half a billion views.

5 A Yes.

6 Q Okay. Audio stream. What is that, like pod casts?

7 A I'm not sure if that means a pod cast or streaming of
8 the videos on other platforms if they were posted elsewhere.
9 So I don't - I'm not sure if that's what that means.

10 Q You're not sure?

11 A Right.

12 Q All right, let's back out of this then. Now there's
13 one thing that I really didn't ask you about. Let's go to
14 the next page. Keep going. Is that it? Okay, we can take
15 that one down. Ms. Paz, is one of the ways that Info Wars
16 offer people to advertise with them that they would say hey,
17 we'll add a headline that looks like a news headline to our
18 website, but it will take our reader to buy something of
19 yours. Did they ever do that?

20 A You mean to craft the ad in a certain way that it
21 doesn't look like an ad, it looks like -

22 Q It doesn't look like an ad, it looks like an Info
23 Wars news headline.

24 A I'm not sure, I don't know.

25 Q You're not sure, okay. Okay, now all of his
26 audience, all of his audience that we've been talking about,
27 remember about what we talked about earlier about the

1 business model?

2 A Yes.

3 Q Maximize that audience, get them all to the content
4 websites and then send them to the store. Right?

5 A Uh-huh.

6 Q Right. Because if you have billions of audience
7 members, some percentage of those people are going to end up
8 buying your stuff.

9 A Sure.

10 Q Right? And that huge audience growth translated into
11 hundreds of millions of dollars in sales. Correct?

12 A Over a broad period of time. What time period are we
13 talking about?

14 Q Well let's take 2012 till today, 2012 to this very
15 moment.

16 A So the last ten years.

17 Q The last ten years. Hundreds of millions of dollars.
18 Right?

19 A I don't know what the exact figure is but it's - it's
20 quite substantial. I don't know if it's hundreds of
21 millions of dollars but -

22 Q Well let's - this is kind of important. Right?

23 A Right.

24 Q It's Free Speech's revenue. You know that you were
25 supposed to talk about it, how -

26 ATTY. PATTIS: Objection, Judge. Can we have a
27 question?

1 BY ATTORNEY MATTEI:

2 Q You knew you were supposed to talk about this.

3 Right?

4 A Yes.

5 Q Okay. And all I'm asking you - I'm not even asking
6 you for a precise number.

7 A Okay.

8 Q Okay. Hundreds of millions. Yes?

9 A I believe so.

10 Q Okay. More than five hundred?

11 A I don't know the exact number, which is why I said I
12 wasn't sure about the exact number.

13 Q What - what would you want to look at to figure that
14 out?

15 A I believe we produced yearly, the revenue from the
16 websites so...

17 Q Did you look at them?

18 A Have I seen them? Yes.

19 Q Okay, but you don't remember anything other -

20 A The numbers off the top of my head?

21 Q Just anything close - more closely if possible than
22 just hundreds of thousands.

23 A I just don't want to guess is my point.

24 Q I don't want you guessing. And as a result of all
25 that revenue, it's fair to say that Alex Jones is becoming a
26 very, very rich man.

27 A Well, Alex Jones owns the company and the website is

1 earning money, but I don't - are you - do you want to talk
2 about the value of the company?

3 THE COURT: Please answer the question that is
4 asked.

5 MS. PAZ: Okay.

6 BY ATTORNEY MATTEI:

7 Q He's become a very, very rich man. Hasn't he?

8 A I can't - I don't - I can't talk about his personal
9 finances. I'm here to talk about Free Speech.

10 Q Well, didn't you produce at least some evidence
11 concerning his compensation?

12 A Yes, we produced some evidence as far as his draws
13 from Free Speech, as well as his compensation for the years
14 at issue.

15 Q And you know having reviewed that, he's become a
16 very, very rich man. Hasn't he?

17 A I know he's made some millions of dollars, yes.

18 Q Ms. Pax, some millions?

19 A Some millions. Would you like to talk about specific
20 numbers? I don't recall the specific numbers.

21 Q Has he made personally a hundred million dollars?

22 A I don't know what the number is.

23 Q All right. All right, so let's do this. So Ms. Paz,
24 Alex Jones started his - the Alex Jones Show - pardon me, a
25 radio show in Austin, Texas. Correct?

26 A Yes.

27 Q Twenty years ago, something like that.

1 A A long time ago, yes.

2 Q Okay. And shortly after that he formed Free Speech
3 System and Info Wars. Right?

4 A Yes.

5 Q And the reason he formed Free Speech Systems was to
6 create a platform for him to make money off of his radio
7 show. Right?

8 A Well right, to expand the radio show, to build that
9 brand, build that practice, yes.

10 Q Okay, thank you. And he was syndicated across the
11 country. We saw the 150 million affiliate - sorry, 150
12 affiliates.

13 A Right, on the radio, yes.

14 Q On radio, okay. And that's when he started his
15 website Infowars.com. Right?

16 A Right, at some point thereafter.

17 Q Okay. And Infowars.com started to publish articles.
18 Right?

19 A Right.

20 Q And styled itself as a news website. Yeah?

21 A Yes, yes.

22 Q And he started to sell stuff too. Right? Not
23 supplements at that time, he was selling -

24 ATTY. PATTIS: Objection. Which time, Judge?

25 ATTY. MATTEI: I'm talking about the early
26 2000's getting started.

27 BY ATTORNEY MATTEI:

1 A The very early period that -

2 Q Yeah.

3 A So, I mean at some point they weren't selling
4 supplements when they first got started.

5 Q Right.

6 A Right. But I can't remember the year after that, but
7 it was some time later.

8 Q Yeah. So first it was like DVD's he was selling.
9 Right?

10 A Yeah.

11 Q Okay. He'd sell some merchandise. Yeah?

12 A Right.

13 Q Sell some ads. Right?

14 A Yeah, here and there. I mean nothing crazy.

15 Q And he - and he had a magazine that he was selling?

16 A He did have a magazine, yes.

17 Q Right.

18 A I've seen the magazine.

19 Q He had an email newsletter. Yeah?

20 A Yes.

21 Q He started filming his radio show and streaming it to
22 Infowars.com?

23 A Yes.

24 Q He started building some other websites like Prison
25 Planet TV. Right?

26 A Right.

27 Q Prisonplanet.com.

1 A Yes.

2 Q He got on social media as we were talking about.
3 Yeah?

4 A Uh-huh.

5 Q And the whole - the whole message, the overarching
6 message that he was sending out to his audience from the
7 very beginning until now is that there is a group of
8 international media financial and political elites,
9 including in our own government, that are conspiring to
10 establish a global tyrannical government to enslave and
11 ultimately kill people. Right?

12 A Those are his opinions, yes. But he created his
13 brand and to broadcast those opinions, yes.

14 Q Right. Well, when you say - I'm not - I'm just
15 talking about this one message. Okay?

16 A Uh-huh.

17 Q I'm not asking you about an opinion because Alex
18 Jones tells his audience that this is in fact the case.
19 Right?

20 A That global elites are -

21 Q Let me read it to you again.

22 A Sure.

23 Q Okay. Alex Jones has conveyed to his audience for
24 the past twenty some years that there is in fact a global
25 conspiracy of international media financial and political
26 elites, including our own government, who are conspiring to
27 establish a global tyrannical government to enslave and

1 ultimately kill people. Correct?

2 A He has said that, yes.

3 Q And he hasn't said hey, this is just my opinion.

4 What he said to his audience is, this is in fact happened.

5 Right?

6 A That's what he thinks is happening.

7 Q And that's what he tells his audience to believe.

8 Correct?

9 A Yes.

10 Q Okay. And one of the ways he gets his audience to

11 believe that is by telling his audience that he is a

12 journalist. Right?

13 A I know that he has said that he is a journalist and I

14 have talked to him about this particular issue.

15 Q Okay, I just want -

16 A But he has said it on a couple of occasions, yes.

17 Q Ms. Paz, a couple of occasions?

18 A I don't know how many times but the broad -

19 Q Okay, well you're under oath, we're in court.

20 A Yes.

21 Q So let's not - let's just say -

22 ATTY. PATTIS: Objection, Judge. Can we have a
23 question rather than admonishments.

24 ATTY. MATTEI: Well I think it is important for-

25 ATTY. PATTIS: Objection, Judge. May we have a
26 question rather than argument?

27 THE COURT: All right, so why don't you ask the

1 next question?

2 ATTY. MATTEI: All right.

3 BY ATTORNEY MATTEI:

4 Q So just to be clear, Alex Jones hasn't told his
5 audience that he's a journalist a couple of times. He
6 advertises on his website that he is a journalist. Correct?

7 A I don't recall as I'm sitting here seeing
8 advertisements.

9 Q All right. Well let's go to that then. Do you know
10 which -

11 ATTY. PATTIS: Number, please?

12 THE COURT: Seventy-two.

13 ATTY. PATTIS: Thank you.

14 THE COURT: Is that a full exhibit?

15 THE CLERK: Full exhibit, Your Honor.

16 BY ATTORNEY MATTEI:

17 Q All right, now let's pull this one up. This is - and
18 you know this because when Michael Zimmerman was Info Wars
19 Corporate Representative doing what you are doing now, he
20 testified that this was on Infowars.com website in 2015.
21 Correct?

22 A Yes, I do recall seeing this.

23 Q All right. And let's go to - let's see if - I think
24 it's right between the first and second page. Do we have it
25 here? Here it is. Syndicated radio journalist and
26 documentary film maker. Right?

27 A I see that, yes.

1 Q You can take that down, okay. So in 2015 when his
2 website is getting millions and millions and millions of
3 views, they're seeing that he's a journalist. Right?

4 A That's what that says.

5 Q Right. He didn't say it a couple of times, he said
6 it every time somebody came to his website.

7 A Well, it's all on the website.

8 Q Right.

9 A So it's however many times it's viewed.

10 Q Well, we know how many times the website was viewed
11 in 2015. Right?

12 A Right, right.

13 Q Okay. Tens and tens and tens of millions.

14 ATTY. PATTIS: Objection, Judge. Asked and
15 answered, in evidence.

16 THE COURT: Overruled.

17 BY ATTORNEY MATTEI:

18 A Yes, we already talked about it.

19 Q Okay, we agree that's more than a couple.

20 A I'm sorry, I guess I misinterpreted you when he's
21 saying it versus when it's being published on the website.

22 Q Okay, maybe I wasn't clear, I'm sorry.

23 A So sorry for the confusion there.

24 Q And so getting back to my question. One of the ways
25 that Alex Jones gets his audience to believe that there's
26 this global conspiracy out to kill and enslave them is by
27 telling them that he is a journalist. Right?

1 ATTY. PATTIS: Objection, Judge. Asking her to
2 speculate on the contents of another mind and its
3 impact on the listener.

4 THE COURT: Overruled.

5 BY ATTORNEY MATTEI:

6 A Is the question whether the purpose, the reason why
7 Alex said these things? I don't know.

8 Q You met with Alex Jones. Right?

9 A I did.

10 Q You took notes of your conversation with Alex Jones?

11 A I did.

12 Q Did you put in all caps at the bottom of your notes
13 that Alex Jones told you, he is not a journalist?

14 A Yes.

15 Q That was very important for him, for you to tell this
16 jury. Right?

17 A It was important for him to get across to me that
18 that's what he thought.

19 Q No, no, no. It was important to him that you tell
20 this jury that because he knew that's what you were going to
21 do.

22 ATTY. PATTIS: Objection, argumentative. She
23 doesn't know what he was -

24 THE COURT: Overruled.

25 BY ATTORNEY MATTEI:

26 A I don't know if he knew I was going to tell the jury
27 that or - but he wanted me to understand that's what his

1 position was.

2 Q Well he's paying you \$37,000 to testify here. Right?

3 A I was paid to do a broad array of analysis of the
4 company and to testify in connection with the Texas
5 litigation and here, yes.

6 Q So there's no question that he knew you were going to
7 come here and testify to these people. Right?

8 A I'm sure he -

9 ATTY. PATTIS: Objection, Judge. Again, calls
10 for speculation in what Mr. Jones knew. He'll
11 testify here.

12 THE COURT: Overruled.

13 BY ATTORNEY MATTEI:

14 Q He knew you were going to testify this week?

15 A Well I'm sure he knew that I was designated as the
16 corporate rep and so that was my purpose so, yes.

17 Q And he wanted you to tell them that he's not a
18 journalist. Right?

19 A That is the sum and substance of what my conversation
20 was.

21 Q But what he tells his audience is that he is a
22 journalist. Right?

23 ATTY. PATTIS: Judge, asked and answered.

24 THE COURT: Overruled.

25 BY ATTORNEY MATTEI:

26 A He has, as we saw in the exhibit, yes.

27 Q And he says that because he wants them to believe

1 what he's saying is true. Right?

2 ATTY. PATTIS: Asked and answered.

3 THE COURT: Overruled.

4 BY ATTORNEY MATTEI:

5 A I don't - I can't say to what is in his mind so -

6 Q All right.

7 A - I don't know his purpose.

8 Q He - he doesn't want his audience to know that he
9 doesn't verify facts that he puts on the air. Right?

10 A He doesn't want them to know that he doesn't do
11 internal research. Is that what the question is?

12 Q No. You know that Alex Jones does not verify the
13 facts that he's putting on the air. Right?

14 A If he reads it somewhere he will just broadcast it
15 elsewhere, so he doesn't do any independent analysis of what
16 he's reading elsewhere.

17 Q He doesn't. Right?

18 A That's correct.

19 Q But he tells his audience that he does.

20 ATTY. PATTIS: Objection. He's
21 mischaracterizing the testimony.

22 THE COURT: Sustained.

23 BY ATTORNEY MATTEI:

24 Q He tells his audience that he does do deep research.
25 Doesn't he?

26 ATTY. PATTIS: Objection. Same objection as
27 what's previously stated.

1 THE COURT: All right, I'm going to allow it.

2 BY ATTORNEY MATTEI:

3 A Is the question whether he has said that he has done
4 deep research?

5 Q Yes.

6 A I recall that he has made such a comment on at least
7 maybe one or two occasions regarding Sandy Hook, yes.

8 Q You recall the comment he made where he said, I did
9 deep research and it just pretty much didn't happen. Right?

10 A Essentially that's what the - the quote is.

11 Q And that's what he wanted his audience to believe.
12 Right?

13 A That's what he said on that particular occasion.

14 Q All right. And when he's telling his audience, this
15 claim about that they were under attack. He would latch
16 onto stories in the news to prove that to them. Right?
17 That's a lot of what he does on the show.

18 A Under attack by whom?

19 Q This whole conspiracy that's out to kill him.

20 A Him or everyone?

21 Q Everyone.

22 A Everyone, right. So what he'll do is he'll take a
23 news article, he'll pull it from a list of sources that he
24 uses and he'll print them out and he has a desktop camera
25 and he'll zoom in on it and he will talk about whatever it
26 was that interested him in the news that day.

27 Q And the idea here is that he'll see something in the

1 news, like let's just take a food shortage. You know that
2 Alex Jones has told his audience that this global conspiracy
3 is intentionally manufacturing food shortages just to starve
4 him. Right?

5 A That's what he thinks, yes.

6 Q That's what he says.

7 A That's what he thinks so that's what he says.

8 Q Ms. Paz, did Alex Jones tell you, I think there are
9 food shortages happening?

10 A I did not talk to him about food shortages.

11 Q Okay. So please don't testify as to what he thinks
12 if he didn't tell you that.

13 ATYT. PATTIS: Objection, Judge. Can we have a
14 question rather than an admonishment.

15 THE COURT: Well, I would just reiterate to you,
16 you have to say - answer the question that's asked.
17 And you're not to distinguish between what he said
18 and what he thinks.

19 MS. PAZ: I don't know what he thinks.

20 BY ATTORNEY MATTEI:

21 Q You just know he said that, about -

22 A Have I seen him say on video food shortage - that
23 there are food shortages being caused? I've seen him say
24 things like that, yes.

25 Q Right. And he says, there's a food shortage, this
26 global conspiracy is out to starve me. Right?

27 A That's what he says.

1 Q And you know he sells that audience food buckets, a
2 store with food. Right?

3 A Yes.

4 Q He says, don't let them starve you, buy my food.
5 Right?

6 A That's what he says on the videos, yes.

7 Q He - and he - you know that he's told his audience
8 that one of the ways the globalists are trying to kill them
9 and starve them out is by intentionally polluting the food
10 and water supply.

11 A I believe he has said that, yes.

12 Q And the way he tells them to deal with that is by
13 buying his water filtration systems. Right?

14 A I believe they are connected to the advertisement for
15 that, yes.

16 Q And those same chemicals, in addition to poisoning
17 the water supply, are zapping his audience's libido. Right?

18 A I believe so, yes.

19 Q And so he sells them to deal with that super male and
20 super female vitality in order to fight back and to save
21 themselves. Yeah?

22 A Right, they're connected to those advertisements for
23 those products.

24 Q Right, right. And he says to his audience that this
25 whole conspiracy has intentionally released pandemics upon
26 them to kill off a significant part of the population.
27 Right?

1 A I believe he has said that, yes.

2 Q Including the Covid 19 pandemic.

3 A He's said that, amongst other things about Covid.

4 Q And what he's offered his audience as a way to deal
5 with that are immunity boosters. Right? So that if they
6 buy his products, they can be safe from Covid that has been
7 intentionally inflicted upon them to kill them?

8 A He has said those things, yes.

9 Q And in fact, he's received - withdrawn. And the way
10 he's able - by the way, were you here during opening
11 statements?

12 A I was in the building but I wasn't in the room.

13 Q You weren't in - were you in the overflow room?

14 A No.

15 Q Okay. You're familiar with Alex Jones' product
16 Vesobeet?

17 A I'm sorry, I'm not.

18 Q Okay. It's like beet juice.

19 A Okay. I don't know.

20 Q Do you know what Alex Jones says about the health
21 benefits of beet juice?

22 A I don't recall specifically statements regarding beet
23 juice.

24 Q Okay.

25 A Sorry.

26 Q So you know what it retails for?

27 A I don't.

1 Q And a way, am I correct, that Alex Jones has been
2 able to convince his audience to buy this stuff is by
3 convincing them that he is the only one who's telling the
4 truth about this. Right?

5 ATTY. PATTIS: Objection as to the form, Judge.
6 It calls for speculation on the contents of other
7 minds.

8 THE COURT: Can you rephrase the question?

9 ATTY. MATTEI: Sure.

10 BY ATTORNEY MATTEI:

11 Q Free Speech Systems agrees that Alex Jones' has built
12 a very loyal following. Correct?

13 A Sure.

14 Q Okay. A very engaged following?

15 A Yes.

16 Q His credibility with his audience is essential to his
17 ability to sell them products. Correct?

18 A I think he said that too so, yes.

19 Q And that's what he tells them, that when they come to
20 Info Wars, he'll give them the truth and nothing but.
21 Right?

22 A I think that's one of his tag lines so, yes.

23 Q And he calls his audience, truth seekers. Correct?

24 A Yes.

25 Q And even though Alex Jones is not a journalist, he
26 tells his audience that he will deliver them the truth in
27 journalism. Correct?

1 A I think that's also a tag line, yes.

2 Q Do you recall at David Jones' deposition when he was
3 asked, you have a very unique audience that is highly loyal
4 to you and purchases products based on essentially Alex
5 Jones' credibility with them. Is that fair - do you recall
6 his testimony was, yes?

7 A I do recall that, yes.

8 ATTY. MATTEI: We want to take the lunch at 1,
9 Judge?

10 THE COURT: I think 1 to 2 is what we plan on
11 doing.

12 ATTY. MATTEI: Okay.

13 BY ATTORNEY MATTEI:

14 Q And not only was he telling his audience that they
15 count on him for the truth and that he's offering them truth
16 in journalism but that he would reveal the truth to them
17 where others wouldn't. Right?

18 A I believe he's said that, yes.

19 Q Because to him the mainstream, what he calls the
20 mainstream media, they're in on this conspiracy to kill
21 people. Right?

22 A He said that, yes.

23 Q All right. Let's play -

24 ATTY. MATTEI: One moment, Your Honor.

25 BY ATTORNEY MATTEI:

26 Q All right, Ms. Paz, you're aware that on the day of
27 the Boston Marathon bombing Alex Jones was broadcasting.

1 Correct?

2 A Did he broadcast that day?

3 Q Yeah.

4 A Yes, he did.

5 Q All right. And I'm going to play you a clip from
6 Plaintiff's Exhibit 10, which is being admitted as - he also
7 broadcast on April 16th, 2013. This would be Exhibit 10A.

8 THE COURT: This is a full exhibit.

9 ATTY. PATTIS: It is a full exhibit, Your Honor.

10 ATTY. MATTEI: It was made a full exhibit this
11 morning, Your Honor.

12 ATTY. PATTIS: It's just a clip, sir?

13 ATTY. MATTEI: Yes.

14 ATTY. PATTIS: Which one?

15 ATTY. MATTEI: 10A.

16 ATTY. PATTIS: Thank you.

17 (The clip from Exhibit 10A was played, after
18 which the following occurred.)

19 BY ATTORNEY MATTEI:

20 Q This is what we were talking about earlier when Alex
21 Jones was telling his audience that somebody's got to tell
22 them the truth. Right?

23 A Yes.

24 Q This is five months after Sandy Hook. Yeah?

25 A I don't recall exactly when the bombing happened in
26 Boston but close.

27 Q Assume - assume with me that this is April 16th,

1 2013.

2 A Sure.

3 Q Five months after Sandy Hook. Correct?

4 A I'll take your representation that it was five months
5 later.

6 Q Okay. They staged Sandy Hook, the evidence is
7 overwhelming. Right?

8 A Amongst other events but, yes.

9 Q I'm asking you about Sandy Hook right now.

10 A Yes, he says Sandy Hook in the video, yes.

11 Q Okay. The evidence is overwhelming. Right?

12 A Yes.

13 Q You'd agree with me that - well you heard him say
14 also that they staged Arora. Right?

15 A I did hear that, yes.

16 Q What was he talking about there?

17 A The shooting at the movie theater at Arora, Colorado.

18 Q There was a shooting at a movie theater in Arora in
19 August of 2012. Right?

20 A I don't recall the date of that shooting but it was
21 prior to this video.

22 Q A few months before Sandy Hook.

23 A Yeah.

24 Q And he said that was staged.

25 A Yes.

26 Q Because one of the things that Alex Jones does is he
27 tells them that these horrible mass shootings are actually

1 hoaxes. Right?

2 A The ones that he mentions there, yes.

3 Q And he tells his audience that American government is
4 staging these events as a pretext for disarming them.
5 Right?

6 A He has used those - that type of words, verbiage in
7 terms of second amendment and second amendment rights so,
8 yes.

9 Q Okay. I'm not asking about the second amendment.
10 Okay. I'm telling - I'm asking you to confirm that what
11 he's saying is that these - that - the hoax is intended to
12 disarm the American public. Correct?

13 ATTY. PATTIS: Objection to form, Judge.

14 Objection to the form. I apologize.

15 THE COURT: Overruled.

16 BY ATTORNEY MATTEI:

17 A In this clip?

18 Q No, no. Well just talk about Sandy Hook for a
19 minute. All right?

20 A Okay.

21 Q He tells his audience over years and years and years
22 that Sandy Hook was a fake hoax events - hoax event and the
23 reason these evil globalists did, faked it, is because they
24 wanted to create a pretext for disarming them. That's what
25 he says to his audience. Yes?

26 A That's one of the things he says about Sandy Hook,
27 yes.

1 Q And the reason these evil people want to disarm you
2 is so that it's easier to enslave and kill you. That's the
3 threat. Right?

4 A That's what he says about various shootings, yes.

5 Q And this strategy of telling his audience that they
6 can count on him for the truth was paying off both in terms
7 of audience growth and in (inaudible). Correct? I'm
8 talking about the period let's say, leading up to the Sandy
9 Hook shooting?

10 A The strategy related to what? I'm sorry, I don't
11 understand your question.

12 Q What we've been talking about. This message that
13 he's been pushing out and telling his audience that all of
14 these things that they have to fear, A, he has remedies for
15 that he'll sell them and B, he's the only one that will tell
16 the truth about it. That strategy's working for him.
17 Right?

18 A Well, if you're looking at the social media numbers
19 and the visits to the sites, yes.

20 Q But before that, even before Sandy Hook, that was the
21 strategy and it was working. Right?

22 A I think it's been the strategy - I think it's been
23 his strategy.

24 Q And in 2011 he was profiled in Rolling Stone
25 Magazine. Correct?

26 A I don't recall. I don't - I don't recall, I'm sorry,
27 as I sit here.

1 Q Do you recall looking at his website where he cites
2 the Rolling Stone article and the comments made on him?

3 A I don't remember, sorry.

4 Q Do you know what I'm talking about when I say,
5 Rolling Stone article?

6 A No, I don't remember.

7 Q You don't? Okay. Let's - and by 2011, Ms. Paz, at
8 least by 2011 Alex Jones knew that his audience could be
9 provoked to violence. Correct?

10 A I don't know what Alex knows.

11 Q Free Speech Systems knew that its audience could be
12 provoked to violence.

13 ATTY. PATTIS: Judge, may we approach.

14 Objection, may we approach?

15 THE COURT: Yes.

16 (A sidebar conference took place.)

17 THE COURT: Is this something we should excuse
18 the jury for?

19 ATTY. PATTIS: No.

20 THE COURT: Because if it's an objection it
21 needs to be done on the record.

22 ATTY. PATTIS: I thought all these were on the
23 record?

24 THE COURT: I mean -

25 ATTY. PATTIS: Are you going to be brief? It's
26 just that I don't know. I don't know Free Speech
27 Systems knew what Alex and what she was told. I

1 don't know that the plaintiffs can have it every
2 which way.

3 They filed a motion to say she can't testify
4 about what others told her but a corporation,
5 (indiscernible).

6 I didn't have a chance to read it but the
7 representation was - (indiscernible).

8 THE COURT: I didn't even read it so -

9 ATTY. PATTIS: I hadn't myself, it came in last
10 night.

11 But my understanding, the corporation is a legal
12 fiction, it doesn't know things. She does, people in
13 it do. If Alex didn't know. If there's questions
14 about if the others knew.

15 But to ask her what the corporation knew is sort
16 of asking what the United States knows. It's a legal
17 fiction, it doesn't exist as an entity with a memory
18 or a mind or the ability to (indiscernible). But the
19 question is frankly meaningless.

20 THE COURT: I disagree so how do you want to
21 proceed?

22 ATTY. PATTIS: I made my objection and I don't
23 need to argue it at this point. Maybe later in the
24 day, Judge.

25 ATTY. MATTEI: May I continue, Your Honor?

26 THE COURT: You may.

27 BY ATTORNEY MATTEI:

1 Q In 2011 Free Speech Systems knew that Alex Jones'
2 audience could be provoked to violence. Correct?

3 A I don't know. Are you referring to a specific
4 incident?

5 Q Well, I'm getting there. So is your answer, I don't
6 know?

7 A I don't know what you're referring to.

8 Q Okay.

9 ATTY. MATTEI: Can I have one moment, Your
10 Honor.

11 THE COURT: Take your time.

12 ATTY. MATTEI: Exhibit 74, Your Honor. I
13 believe it's in as a full exhibit?

14 THE CLERK: Yes, it is.

15 ATTY. MATTEI: Okay.

16 BY ATTORNEY MATTEI:

17 Q All right. Now, are you familiar with this webpage
18 on Infowars.com. It's an about Alex Jones webpage. Do you
19 see that?

20 A Yes.

21 Q And this was in 2016. You recall Mr. Zimmerman's
22 testimony that this appeared on 2016 website. Correct?

23 A I believe so, yes. I do recall that testimony,

24 Q All right. And let's go to page - actually, can you
25 go back to that page 1? Okay, I don't want to belabor this
26 point but in the second paragraph there it says that he
27 routinely breaks huge stories. Right?

1 A That third full paragraph?

2 Q Yeah, he routinely breaks huge stories.

3 A That's what it says, yes.

4 Q Right. But he's not a journalist so that's not true.

5 Right?

6 ATTY. PATTIS: Objection, argumentative.

7 THE COURT: Sustained.

8 BY ATTORNEY MATTEI:

9 Q Okay, I'll move on. Let's go to the next page. Next
10 page. All right, here we go, okay. So you see here on this
11 webpage about Alex Jones, they reference a 2011 Rolling
12 Stones article. Correct?

13 A I see that, yes.

14 Q Okay. And they represent a - or they describe a
15 quote about Alex Jones in that article. Correct?

16 A Yes, I see that.

17 Q Okay.

18 A In the first paragraph. Right?

19 Q Yup.

20 A Yes.

21 Q We can take that down. And Alex Jones actually was
22 interviewed for that article. Correct?

23 A I would assume so based on that article.

24 Q Okay. And so when Free Speech Systems published that
25 article - I'm sorry, released on that website in 2016, it
26 was aware that Alex Jones' audience members had been
27 involved in high-profile acts of violence. Correct?

1 ATTY. PATTIS: Objection, mischaracterizes the
2 item, the exhibit.

3 THE COURT: I'm going to sustain the objection.

4 BY ATTORNEY MATTEI:

5 Q Do you know who Jared Loughner is?

6 A No, it doesn't ring a bell, sorry.

7 Q Okay. Do you recall the assassination attempt on
8 Congresswoman Gabrielle Giffords in Arizona?

9 A Yes.

10 Q Okay. Do you recall when that happened?

11 A I do not, no.

12 Q Okay. And Free Speech Systems acknowledges that
13 Jared Loughner was a big fan of Alex Jones. Correct?

14 A I don't know anything about him so I can't say.

15 Q You haven't read that article?

16 A No.

17 ATTY. MATTEI: Your Honor, I think this would,
18 if it's okay, this would be a natural break in -

19 THE COURT: Actually, I was thinking the same.

20 All right, so we will take our luncheon recess.

21 We will be back in court right promptly at 2 p.m. So
22 just be sure to report back a few, maybe five minutes
23 of 2.

24 Remember all the rules of jury conduct that I
25 told you about. And if you leave the building, it is
26 a beautiful day I'd have to say. So those of you who
27 are going to enjoy the nice weather, at least I'm

1 told it's a beautiful day, just make sure you avoid
2 any of the lawyers or any of the witnesses or any
3 media as you reenter the building.

4 I'm going to stay on the bench and address
5 something with counsel. So we will see you back
6 after lunch.

7 And Mr. Ferraro will retrieve your notepads and
8 secure them.

9 (THE JURY EXITED THE COURTROOM.)

10 THE COURT: So I just - please be seated. I
11 just want to clarify that I really don't want routine
12 objections raised at a side bar, I want them in open
13 court.

14 It is on the record the side bars, yes, but I
15 want the objections made routinely.

16 If there's an issue where you want to have an
17 opportunity to speak with counsel or each other or
18 the Court on some issue, okay, but -

19 ATTY. PATTIS: It was more than a one word one
20 and I didn't think it was appropriate to raise it in
21 the jury's presence.

22 THE COURT: Well then I also don't have - we
23 really have not moved them very much so if there is
24 some argument that needs to be made outside the
25 presence of the jury, I'm happy to do that as well.

26 ATTY. PATTIS: Understood. Thank you.

27 THE COURT: Okay? All right, so I hope everyone

1 has a nice lunch and we'll start promptly at 2 p.m.

2 (The lunch recess was taken.)

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NO: X06-UWY-CV18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022
NO: X06-UWY-CV18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022
NO: X06-UWY-CV18-6046438-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
v. : AT WATERBURY, CONNECTICUT
ALEX EMERIC JONES : SEPTEMBER 14, 2022

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Waterbury, Waterbury, Connecticut, before the Honorable Barbara Bellis, Judge, on the 14th day of September, 2022.

Dated this 14th day of September, 2022 in Waterbury, Connecticut.


Shannon LeRoy
Court Recording Monitor